

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MICHIGAN**

SOUTHERN DIVISION

RYAN BAUGH,

Plaintiff,

v.

CENTRAL INTELLIGENCE
AGENCY,

Defendant.

*
*
*
*
*
*
*
*
*
*

CASE NO.: 2:24-cv-10036 (SKD)

HON. SUSAN K. DECLERCQ

* * * * *

**PLAINTIFF’S CONSENT MOTION FOR FURTHER
ENLARGEMENT OF TIME WITHIN WHICH TO FILE HIS
OPPOSITION TO DEFENDANT’S MOTION TO DISMISS**

NOW COMES Plaintiff Ryan Baugh (“Baugh”) to respectfully request a four-day enlargement of time until 18 June 2024, pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, within which to file its opposition to Defendant’s Motion to Dismiss, Dkt. #10. This brief is due today, 14 June. Defendant Central Intelligence Agency (“CIA”) consents to this Motion, and Baugh is accordingly providing a stipulated order to the Court.

Baugh has good cause to request this extension. The undersigned was required to stop working on most of his scheduled business earlier this week to address an unexpected and urgent development beyond his control in a sensitive

qui tam matter for another client, and while he has been doing his best to manage his workload accordingly (including multiple meetings with government officials which could not be rescheduled, one reply brief filed in this case yesterday, and another reply brief which will be filed today), he has been unable to complete work on his opposition to CIA's motion and will not be able to do so by the midnight deadline. The undersigned regrets the last-minute nature of this Motion; he was diligently attempting to avoid seeking a further extension until this morning, and he then waited to file the Motion until he received a response from CIA's counsel regarding the Agency's position to file it, which he only just received.

This is the third extension requested for this filing.

Date: June 14, 2024

Respectfully submitted,

/s/ Kelly B. McClanahan
Kelly B. McClanahan, Esq.
D.C. Bar #984704
National Security Counselors
4702 Levada Terrace
Rockville, MD 20853
301-728-5908
240-681-2189 fax
Kel@NationalSecurityLaw.org

Counsel for Plaintiff